GORSKI & KNOWLTON PC

CAROL L. KNOWLTON † ALLEN I. GORSKI †

* NJ AND NY BAR † NJ AND PA BAR COUNSELLORS AT LAW 691 STATE HIGHWAY 33 MERCERVILLE TRENTON, NEW JERSEY 08619-4407

(609) 890-1500

FAX NO. (609) 890-6961

OF COUNSEL BARRY W. FROST *

December 11, 2014

Honorable Christine M. Gravelle United States Bankruptcy Court 402 East State Street Trenton, New Jersey

RE: POCMONT PROPERTIES, LLC

CASE NO: 14-16493-CMG

Dear Judge Gravelle:

We are in receipt of the request by the attorney for the Debtor to adjourn the Disclosure Statement hearing. On behalf of Mordechai Fligman and Nisan Funding, LLC, we object to any adjournment and request that the Disclosure Statement be withdrawn if the Debtor is not prepared to address the objections that have been filed to date.

Further we did email our response to Mr. Ringel that we do not consent to the adjournment of the Disclosure Statement and a copy of our email is attached.

Very truly yours

Barry W. Frost

BWF/cla

CC: Fred B. Ringel, Esquire (via email)
Daniel Stolz, Esquire (via email)

Shining Hsu, Esquire (via email)

Nisan Funding, LLC Mordechai Fligman

Greg Kupniewski, Esquire (via email)

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bfrost@teichgroh.com

From:

bfrost@teichgroh.com

Sent:

Thursday, December 11, 2014 12:30 PM

To: Subject: 'Fred B. Ringel' RE: Pocmont

Dear Fred:

With regard to Mordechai Fligman and Asher Berliner, neither will consent to an adjournment of the Disclosure Statement hearing.

Since you are going to have to redo the Disclosure Statement when and if the SBA approves your Buyer, I might respectfully suggest that you withdraw the Disclosure Statement and run an auction sale of the real estate and the hotel.

I look forward to hearing from you.

Very truly yours,

Barry W. Frost
Cheryl L. Acheson, Legal Assistant to Barry W. Frost, Esquire
Gorski & Knowlton, PC
691 State Highway 33
Trenton, New Jersey 08619
(609)890-1500
Fax (609)890-6961

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From: Fred B. Ringel [mailto:fbr@robinsonbrog.com]
Sent: Wednesday, December 10, 2014 12:56 PM

To: bfrost@teichgroh.com

Subject: Pocmont

Barry,

I just spoke with the Small Business Administration counsel and they will need some additional time to finish the loan approval process. Therefore, I will be seeking an adjournment of the disclosure statement hearing that is scheduled for the 16th and Goldebn Bull's motion for relief from the stay. Please advise if your clients will consent to such an adjournment.

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Thanks,

Fred

FRED B. RINGEL, ESQ, | fbr@robinsonbrog.com |

Robinson Brog Leinwand Greene Genovese & Gluck P.C. | 875 Third Avenue | 9th Floor | New York, New York 10022-0123

| Direct Dial: 212-603-6301 | Main: 212-603-6300 | Fax: 212-956-2164

www.robinsonbrog.com

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